

Rollins, Christopher

From: karen shinmoto <karen@islandrecycling.com>
Sent: Wednesday, September 17, 2014 7:03 PM
To: Rollins, Christopher
Cc: Glenn; Jim Nutter
Subject: Re: Island Recycling Follow-up Questions

Follow Up Flag: Follow up
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Christopher:

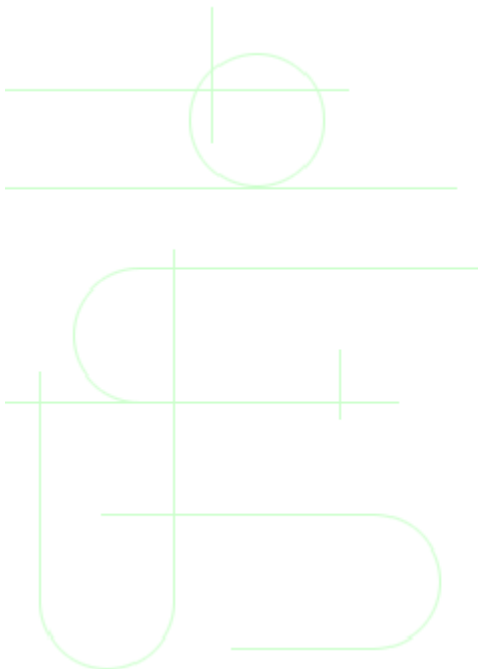
We have another question...

If the capacitor is labeled "NO PCB", can we then collect those separately and treat them as scrap to be recycled?

We will collect all the ones that do NOT have any label and treat them as containing PBCs and dispose of them properly via Pacific Commercial Services.

Mahalo,
Karen

On Fri, Sep 5, 2014 at 1:05 PM, Rollins, Christopher <Rollins.Christopher@epa.gov> wrote:



Karen,

EPA is in receipt of your email response dated 8/28/14, related to EPA's 6/27/14 RCRA hazardous waste inspection, conducted at the Island Recycling, Inc. (IRI) facility located in Kapolei, HI. The following are EPA's comments and questions.

1) Traditionally, hazardous waste is stored and transported off-site in separate individual containers that are labeled, dated and closed. EPA does not recommend that you store different types of hazardous waste in one single container. Even though, in this case, the wastes aren't mixing together, if they were to mix it could cause you additional problems.

Secondly, when the waste is picked up for transport off-site they should already be in DOT approved storage containers. So if you are going to place them in additional containers upon pick-up then the waste in my opinion is not being properly managed at this time.

Please ensure that the waste is properly managed while on-site and when shipped for disposal.

2) EPA will not accept the JOBOX as a hazardous waste container by itself even if dated and labeled. However, if you want to store the waste in individual containers then store the individual containers in the JOBOX that would be acceptable. You can still mark the outside of the JOBOX if you want, but the individual containers still have to be dated and labeled prior to transport off-site.

3) Regarding your Letter from EPA HQ to transport spent batteries. I see that letter as an acknowledgement to export, intact and undrained spent universal waste batteries. Intact batteries are not a hazardous waste but are considered universal waste. It does not become a hazardous waste unless those batteries are open.

4) CRTS can be shrink wrapped for the purposes of transporting them off-site, just as long as the CRTs are not broken and are properly labeled.

5) EPA is still awaiting IRI's responses regarding the accumulation and management of used oil, oily absorbent material, and aerosol cans on-site. Please note that based on the volume of aerosol cans accumulated on-site, IRI may be subject to other requirements under RCRA (e.g., CESQG, SQG or LQG) and may have to notify the agency of this change as well as file reports if applicable.

Please ensure that the cans are properly managed meaning containerize the waste, label and properly date the containers prior to disposal. Please also provide photos to document IRI's return to compliance.

Christopher Rollins

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